## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

Albert William Bleau, Jr.,

:

Plaintiff

:

vs. : Civil Action No.

04-10469 JLT (REK)

Greater Lynn Mental Health & Retardation Association, Inc., et al.,

:

Defendants

## Joint Motion To Continue Hearing Scheduled For April 13, 2005

Plaintiff Albert W. Bleau, Jr., and defendants Greater Lynn Mental Health and Retardation Association, Inc., Eastern

Massachusetts Housing Corporation, Roderick MacLeish, Robert

Sherman, and Robert Griffin jointly move that the Court continue the hearing scheduled for April 13, 2005, to a convenient date, as the Court's schedule may permit, during the following month of May. As grounds therefore the parties state that, between

March 9 and March 23, 2005, the plaintiff filed three motions, three oppositions, and several amendments to those oppositions, accompanied by voluminous attachments. The defendants' responses to these motions and oppositions have yet to be filed pursuant to

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Local Rule 7.1, either because they are not due or because the parties have so agreed. (See attached Schedule A listing outstanding filings and filing dates.) The Court's consideration of the parties' motions would benefit from a plenary hearing, rather than two or more separate ones, since several of the motions are interrelated and the plaintiff's motion for leave to amend his complaint, were it allowed, would affect the course further proceedings substantially.

WHEREFORE, the parties request that the Court grant their motion for a continuance and set a convenient date in May, as the Court's schedule permits, for a hearing on all of the parties' pending motions.

Respectfully submitted, Roderick MacLeish and Robert Sherman by their attorneys,

Respectfully submitted, Greater Lynn Mental Health & Retardation Association, Inc. by its attorneys,

s/ David G. Thomas David G. Thomas BBO No. 640854 Allison K. Jones BBO No. 654804

Greenberg Traurig, LLP One International Pl., 20 fl Two Center Plaza, Suite 620 Boston, Massachusetts 02110 (617) 310-6000

s/ Garrick F. Cole Garrick F. Cole BBO No. 091340 Christina Schenk-Hargrove BBO No. 645164

Smith & Duggan LLP Boston, Massachusetts 02108-1906 (617) 228-4400

Respectfully submitted,

Eastern Massachusetts Housing Corporation

by its attorneys,

s/ Garrick F. Cole

Garrick F. Cole BBO No. 019340 Christina Schenk-Hargrove BBO No. 645164

Smith & Duggan LLP Two Center Plaza, Suite 620 Boston, Massachusetts 02108-1906 (617) 228-4400

Respectfully submitted,

Respectfully submitted, Robert J. Griffin by his attorney,

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s/ Albert W. Bleau, Jr. Albert William Bleau, Jr.

505 Paradise Road Apt. 208 Swampscott, Massachusetts 01907

(781) 962-2662

s/ Donald K. Stern Donald K. Stern BBO No. 479420 Bingham McCutchen 101 Federal Street Boston, Massachusetts 02110-1726

(617) 951-8000

Dated: 5 April 2005

## Schedule A

	DOCUMENT	DATE FILED
1.	Motion to Dismiss by Roderick MacLeish and Robert Sherman	1/28/05
2.	Motion for Entry of Separate and Final Judgment by Robert Griffin	2/1/05
3.	Motion for Summary Judgment by Greater Lynn Mental Health	2/8/05
4.	Motion to Prevent Further Retaliation and Defamation by Albert Bleau	3/9/05
5.	Motion for Summary Judgment by Albert Bleau	3/9/05
6.	Opposition by Albert Bleau to:	
	Motion to Dismiss by MacLeish and Sherman	
	Motion for Entry of Separate and Final Judgment By Griffin, and	
	Motion for Summary Judgment of Greater Lynn Mental Health	3/9/05
7.	Amended Opposition by Albert Bleau to Motion to Dismiss; Motion for Entry of Separate and Final Judgment; and Motion for Summary Judgme AND	
	Motion to Amend Complaint to Add RICO Claim	3/22/05